

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,
Plaintiff

v.

ATTILA GYULAI,
Defendant.

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No. 18 CR 96

Honorable Harry D. Leinenweber

DEFENDANT’S MOTION TO AMEND BOND CONDITIONS AND RELEASE ORDER

NOW COMES Defendant, ATTILA GYULAI, by and through his attorney, John T. Theis, and files the following Motion to Amend the Conditions of his release order in this cause:

1. The Defendant is charged with the offense of Wire Fraud in an indictment before this Court, a violation of 18 U.S.C. Sec. 1343.
2. On June 4, 2019, Defendant was released on a \$250,000 recognizance bond, with several conditions, including a condition of Home Incarceration with location monitoring, except for “medical necessities and other activities specifically approved by the Court.” He has been granted permission to meet with his lawyer, which has done on six occasions, as well as his previous appearance before this Court. He is in compliance with all conditions of bond.
3. Because Defendant had no current Chicago residence at the time of his release, has was allowed to live at the home of his friends (and third-party custodian) Melinda and Ovido Pop, at 4534 North Monitor, Chicago.
4. Defendant is not employed, but has been assisting Ovido Pop with his business, a successful catering business, while contained to the home. Because Defendant is living at the

home through the good graces of his friends, he is working without compensation.

5. Ovid Pop would like Defendant to assist him outside the home, at the catering business kitchen, in Skokie, Illinois, and at job sites. Defendant has years of experience in the restaurant and hospitality industry, and the arrangement would be helpful to both Defendant (who wishes to be able to work) and Mr. Pop (who would greatly benefit from Defendant's assistance).

6. The pre-trial service officer has no objection to the amendment to the condition of bond, and Defendant would inform Pre-Trial of his work schedule on Monday of each week, since the hours and location could vary.

7. In an unrelated request, Defendant would also like an opportunity to exercise by running each day, an activity which he has engaged in throughout his adult life. Defendant is requesting that he be able to leave the house for one hour, at a fixed, regular time, to remain healthy while this matter is pending.

WHEREFORE, Defendant respectfully requests that this Court issue an order allowing him to leave the residence for employment, upon prior notification to Pre-Trial of the specific hours and location, and for health and exercise for one hour at a fixed time each day.

John T. Theis

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